



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

November 3, 2020

FILED VIA CM/ECF

Hon. Christian F. Hummel
United States Magistrate Judge
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, New York 12207

Re: Goodall v. NYS DOCCS et al.
NDNY Civ. No. 19-cv-1359

Dear Judge Hummel,

This office represents the Defendants in the above-captioned lawsuit. I write in response to the Plaintiff's motion for leave to amend his First Amended Complaint (see Dkt. No. 101) and the Court's October 1, 2020 Text Order directing Defendants to respond to the same by or before November 5, 2020.

While not conceding the veracity of any assertions made in the course of Plaintiff's moving papers regarding the substantive merits of the Plaintiff's claims, the Defendants take no position with respect to the grant or denial of the pending motion for leave to amend.

Please feel free to contact the undersigned with any questions or concerns Your Honor may have relating to this matter.

Respectfully submitted,
s/ Kyle W. Sturgess
Kyle W. Sturgess
Assistant Attorney General
NDNY Bar Roll No. 302888

cc: Geoffrey Schotter, Esq. (*via CM/ECF*)
Attorney for the Plaintiff

300 Cadman Plaza West, 12th Floor
Brooklyn, New York 11201
(347) 413-9014

Teresa Caturano, Esq.
DISABILITY RIGHTS NEW YORK
Attorneys for the Plaintiff
25 Chapel Street, Suite 1005
Brooklyn, New York 11201